

operation with respect to processed information items included within the cumulative record, the processed information items corresponding to at least one information item included within the interaction record.

### REMARKS

Responsive to the above Office Action, Applicants have amended the application. Reconsideration of this application is respectfully requested.

The amendment to claim 14 is made to remove typographical errors and not for purposes of patentability. Accordingly, no new matter is added.

#### 35 USC §112 Rejection

In the Office Action, claims 6, 7, 19, and 20, were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The relevant claims have been amended as indicated herein to address the rejections.

#### Oath/Declaration

A Supplemental Oath/declaration is in the process of being executed and will be submitted in a separate communication.

#### 35 USC §102 Rejection

Claims 1-27 stand rejected as being allegedly anticipated under 35 USC §102(2) by U.S. Patent No. 6,262,069 (Kuhn). To anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Kuhn discloses a computer-implemented method and apparatus with enhanced monitoring scheduling capabilities. Specifically, in column 7, lines 10-43, Kuhn discloses a system and method for determining when a call is to be monitored.

Regarding claims 1 and 27, Kuhn does not disclose, "receiving an interaction record including interaction information describing a customer interaction", as required by these claims. Instead Kuhn discloses recording a call if the call is of the correct type, within the day, date, and time parameters of the selected agent, and corresponds to the selected ordinal call number for monitoring (col 7, ln 26-29). Kuhn also fails to disclose identifying a cumulative record to which the interaction record contributes. Kuhn discloses a "K" value which is incremented whenever a call is assigned to the agent within the date/day/time parameters (col 7, ln 29-37). It appears that the Office Action is likening the "K" value disclosed in Kuhn to the cumulative record of the claims. However, Kuhn does not disclose that "K" is anything besides a mere counter.

Regarding claim 14, Kuhn does not disclose a first process to receive a first record including interaction information describing a customer interaction and to identify a cumulative record to which the first record contributes. Instead Kuhn discloses recording a call if the call is of the correct type, within the day, date, and time parameters of the selected agent, and corresponds to the selected ordinal call number for monitoring (col 7, ln 26-29). In addition, Kuhn discloses a "K" value which is incremented whenever a call is assigned to the agent within the date/day/time parameters (col 7, ln 29-37). It appears that the Office Action is likening the "K" value disclosed in Kuhn to the cumulative record of the claims. However, Kuhn does not disclose that "K" is anything besides a mere counter.

If there are any deficiencies of fees associated with this communication,  
please charge our Deposit Account No. 02-2666.

Respectfully Submitted,

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## VERSION OF CLAIMS WITH MARKINGS:

6. (Amended) The method of claim 1, wherein the cumulative record is identified from among a plurality of cumulative records, each of the plurality of cumulative records comprising a row of a result set that includes a plurality of columns, each column [specify] specifying a data operation that determines how [a] the cumulative record, including an entry corresponding to the relevant column, is modified to reflect interaction information contained within [an] the interaction record.

7. (Amended) The method of claim 1, wherein the interaction information included within the interaction record comprises a plurality of information items, and [the modification of] the modifying of the cumulative record comprises performing a data operation with respect [a] to processed information items included within the cumulative record, the processed information items corresponding to at least one information item included within the interaction record.

14. (Amended) A process for processing customer interaction records within a customer interaction system, the process including:

a first processor to receive a first record including interaction information describing a customer interaction and to identify[ing] a cumulative record to which the first record contributes; and

a second process to modify[ing] the cumulative record to reflect the interaction information contained within the first record.

19. (Amended) The process of claim 14, wherein the first process identifies the cumulative record from among a plurality of cumulative records, each of the plurality of cumulative records [constituting] comprising a row of a result set that includes a plurality of columns, each column [specify] specifying a data

operation that determines how [a] the cumulative record, including an entry corresponding to the relevant column, is modified to reflect the interaction information contained within the interaction record.

20. (Amended) The process of claim 14, wherein the interaction information included within the interaction record comprises a plurality of information items, and the second process modifies the cumulative record by performing a data operation with respect [a] to processed information items included within the cumulative record, the processed information items corresponding to at least one information item included within the interaction record.